

Lee Walker

From: Komi Hassan <khassan@newfortressenergy.com>
Sent: Friday, September 16, 2022 5:24 PM
To: Kaplan, Galia CIV USCG COMDT (USA); Barton, Brian (MARAD); Reudelhuber, Matthew A CIV (USA)
Cc: Jenny McCoy; Yezefski, Brent C CIV USCG COMDT (USA); Sparks, Sean; Scott, John
Subject: RE: Stop Clock Notice - S&P Global Article
Attachments: GD_20220915.pdf

Hi Galia, Brian, the article from S&P is attached.

I wanted to let you all know that this evening I am filing a few things:

1. An **Updated Air Quality Dispersion Modeling memo** that includes a Cumulative Modeling Analysis, which incorporated additional emissions sources in the region out to 50km. (Cumulative Modeling). As we estimated, the results of the modeling indicated that the maximum predicted cumulative impact concentrations combined with ambient concentration are less than the NAAQS. The results also show that maximum predicted cumulative impact concentrations are less than the PSD increments. Therefore, after evaluating our emissions out to 20km and 50km (which included other sources within 50km i.e. Cumulative Analysis) our modeled emissions do not result in an exceedance of a NAAQS for any criteria pollutant. All these results should be considered **Final** from NFE and will be considered **Preliminary** by the EPA until they verify the modeling themselves, which is a typical part of the NSR-PSD permitting process.
2. An **Updated NSR-PSD/Title V Permit application** which also includes the **Class I Area Analysis in Section 24.G**. Although we are technically outside the 100km distance limit for this type of analysis for the nearest Class I area, the Breton National Wildlife Refuge; and the USFWS did not think we would have an impact on the refuge, the analysis was conducted to be thorough and complete. The results of the analysis indicate, consistent with our dispersion modeling, that we will not have any adverse impact on Breton or any adverse impact on any other Class I Area. (See Section 24.G of the Permit Application). This is also consistent with modeling done by Venture Global for their Plaquemines LNG project which is within 100km of Breton and 7 times larger than our project but was shown to not have an impact on Breton. This updated application is also being **filed with the EPA**.
3. **Day/Night Visual Simulation Renderings** from multiple vantage points for inclusion in the visual and aesthetic assessment.
4. A **Supplementary Environmental Baseline Survey** report (Benthic) that includes the revised pipeline routes.
5. A **Supplementary Shallow Geotechnical Investigation** report (Box Cores, Piston Cores, CPT's) that includes the revised pipeline routes.
6. We have previously provided sound pressure levels associated with in-water pile driving for our project which can be used to assess noise impacts and noise mitigation measures however we are also submitting an **Underwater Acoustic Noise Modeling** memo that describes the next steps in the **NMFS IHA** process (our proposed mitigation measures for noise impacts were provided previously). It should be noted that the Project has no terrestrial impacts that would trigger a **Biological Assessment**, so only an IHA is required.

I also believe there is some confusion around the mention of Biogenic Gas in our Geohazards report so Fugro is preparing a memo on Biogenic gas as well as a methodology for sampling biogenic gas. Their experts told us that, based on their stratigraphic database of the region that they do not believe Biogenic gas is an issue and that they should have been clearer about the potential impacts of Biogenic Gas on our project (none to negligible) so I have asked them to clarify. The presence of Biogenic gas should not be confused with the presence of Methane Gas Hydrates which were not identified in or near our project area but can often be confused with Biogenic gas.

Please let me know if you have any questions. We are compiling the filing now, but I wanted to give you a heads up. **Please let me know if you have identified a time/place for the proposed meeting on next Friday.**

Thanks,

Komi

Komi Hassan
Cell: 281.704.5391

From: Kaplan, Galia CIV USCG COMDT (USA) <Galia.Kaplan@uscg.mil>
Sent: Thursday, September 15, 2022 11:48 AM
To: Komi Hassan <khassan@newfortressenergy.com>; Barton, Brian (MARAD) <brian.barton@dot.gov>
Cc: jmmccoy@edge-es.com; Yezefski, Brent C CIV USCG COMDT (USA) <Brent.C.Yezefski@uscg.mil>
Subject: RE: Stop Clock Notice - S&P Global Article

Hi Komi,

Appreciate the heads up.

From: Komi Hassan <khassan@newfortressenergy.com>
Sent: Thursday, September 15, 2022 11:44 AM
To: Kaplan, Galia CIV USCG COMDT (USA) <Galia.Kaplan@uscg.mil>; Barton, Brian (MARAD) <brian.barton@dot.gov>
Cc: jmmccoy@edge-es.com
Subject: [URL Verdict: Neutral][Non-DoD Source] Stop Clock Notice - S&P Global Article

Hi Galia, Brian,

For your information, analysts and business reports follow the filings on our docket, independent of any involvement from NFE. We learned this morning that S&P Global Commodity Insights is about to publish an article on the Stop Clock Notice that was posted on our docket. You may get some calls regarding the article, so I wanted to give you a heads up. Any update on the status of the review, we are happy to meet in person or via teams to discuss any clarifications that are needed.

Thanks,

Komi

Komi Hassan



Cell: 281.704.5391
111 W 19th St, 2nd Floor New York, NY 10011
www.newfortressenergy.com